

Exhibit 1

Arizona

Exhibit 1A

Meta's Proposal[s]

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Search Terms: Meta made its most recent counterproposal on December 10, 2024 to the Arizona (i) Board of Education, (ii) Department of Education, and (iii) Department of Child Safety and offered the same as an initial proposal to the (iv) Department of Health Services. At a high level, Meta’s proposal involves using search strings that require a combination of the following search term categories. So, for example, a document would have to include one of the “Social Media/Device Terms” *and* a “Youth Term” to be included in the review process, etc.

- Social Media/Device Terms w/200 Youth Terms
- Youth Terms w/200 Harm or Wellbeing Terms
- Youth Terms AND Other Terms w/200 Social Media/Device Terms

#	Social Media/Device Terms
1	"social media" OR "social network" OR Meta OR Facebook OR Instagram OR Insta OR Youtube OR Snapchat OR Snap OR Bytedance OR TikTok OR Twitter OR Tweet OR Netflix OR Reddit OR Pinterest OR Tumblr OR telegram OR signal OR viber OR finsta OR FB OR IG OR YT OR TT OR DM* OR device* OR iphone* OR android OR phone* OR screen OR cell* OR internet OR video OR videogame OR gaming OR apps OR Ipad OR tablet OR laptop OR computer OR chromebook
	Youth Search Terms
2	((gen OR generation) w/2 (alpha OR "z"))
3	teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR U18 or “under 18”
4	scholar* OR School* OR student* OR pupil* OR grade* freshman OR freshmen OR sophomore* OR junior*
5	ACE*
	Harm or Wellbeing Terms
6	advers* w/10 experience* OR ACE*
7	(bodies OR body) w/3 (mass* OR shape* OR fat* OR image* OR thin* OR skinny OR slim* OR acceptance OR dissatisfaction OR positivity OR image OR dysmorph*)

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8	(negativ* OR compar*) w/3 (appearance OR experience OR affect* OR effect* OR social OR other*)
9	"BMI" OR overweight OR fat OR obes* OR diet* OR anorexi* OR bulimi* OR orthorexi* OR appetite OR dysmorph* OR binge OR purge
10	(eat* OR sleep*) w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*)
11	bully* OR bullie* OR cyberbull* OR harass* OR sextort*
12	transphob* OR homophob* OR racis* OR sexis* OR (gender w/10 (dysphoria OR iden*))
13	suicid* OR unalive OR cutting* OR selfharm OR "self-harm" OR NSSI OR “non-suicidal self injury” OR sad* OR reclus* OR (self w/3 (harm OR esteem OR control OR injur* OR mutilat* OR regulat*))
14	svap* OR "ecig" OR “e-cig” OR cig* OR smok* OR nicotine OR tobacco OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent* OR opio* OR opia* OR meth OR methamphetamine OR oxy OR oxycontin OR painkiller* OR narcotic* OR drug* OR alcohol* OR Juul
15	(compuls* OR problem* OR addic* OR overdos* OR excess* OR increas*) w/3 (use* OR using OR usage)
16	dopamine
17	(mental w/3 health) OR "TMH" OR (psych* w/10 (concern* OR issue*))
18	"negative spiral"
19	"social reward*" OR "social approval"
20	“risk factor*” OR “protective factor*”
21	"social connectedness" w/10 (limit* OR decrease* OR less*)
22	danger* OR warn*
23	wellness* OR wellbeing OR "well-being" OR empath* OR compassion*
24	confidence OR "self-confidence"
25	health w/5 (interact* OR behavior* OR online)

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26	technology w/5 (responsible OR health*)
27	serious w/5 (concern* OR issue OR situation*)
28	emotion* w/5 (abuse* OR support OR regul*)
29	violen* OR abus* OR assault* OR fight* OR altercation OR killchallenge OR misbehav* OR misconduct* OR shoot* OR shot OR threat* OR gun* OR pistol OR rifle OR firearm OR rape* OR murder* OR traff* OR groom* OR hookup* OR solicit* OR pedophile* OR predator* OR sex* OR extort OR exploit*
30	NCII OR “non-consensual intimate imagery” OR CSEC OR CSAM OR NCOSE OR NCMEC
31	“internet crime*” or ICAC
32	(hate*) w/25 (crime OR attack* OR conduct* OR misconduct*)
33	therap* OR counsel* OR treatment* OR inpatient
34	"attention deficit" OR "ADHD" OR posttraumatic OR "bi-polar" OR "bi polar" OR bipolar OR "BPD" OR anxi* OR stress* OR depress* OR insomnia OR ((personality OR behavior*) w/3 (disorder* OR concern* OR issue* OR health* or delinquent))
35	"SSRI" OR "SNRI" OR "s.n.r.i." OR "s.s.r.i." OR serotonin OR mood OR “anti-anxiety” OR antidepress*
36	divorce* OR "foster care" OR "foster family" OR homeless* OR unhous* OR ((difficult OR broken) w/5 (famil* OR home*))
37	(Covid* OR coronavirus OR pandemic OR lockdown OR "lock* down" OR quarantine OR (social* W/3 distanc*)) w/15 (sad* OR depress* OR anxi* OR stress* OR scar* OR afraid OR angry OR mad OR worr* OR lonel* OR alone)
38	"time spent" OR "engagement" OR (watch* w/2 time) OR impression*OR "MAU" OR "DAU" OR "MAP" OR "DAP" OR "WAU" OR "WAP"
39	addict* OR staytime OR timespent OR "time spent" OR "mandatory break" OR "limiting tool" OR "habit loop" OR "operant conditioning" OR "impulse control"
40	screen w/10 (time OR manag* OR control* OR limit) OR screentime

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41	"prefrontal cortex" OR "cognitive development" OR neuroadaptation
42	(detect* or develop*) w/3 (age OR brain*)
43	"emotion study" OR "personalized feedback"
	Other Terms
44	polic* OR practice* OR presentation OR assembl* OR initiative* OR interven* OR prevent* OR limit* OR control* OR legislation OR advocacy OR lobby* OR legislat* OR suspend* OR revok* OR fine* OR sanction* OR cancel* OR abandon* OR ban OR banned OR banning OR concern* OR problematic OR investigat* or criminal OR charges OR conviction* OR arrest* OR “law enforcement”
45	positive* w/3 messag*
46	deceptive OR decei* OR fraud* OR defraud* OR cheat* OR lie* OR misrepresent* OR mislead* OR schem* OR exploit* OR trick* OR conceal* OR hide OR omit* OR downplay* OR suppress* OR "cover up"
47	"Consumer Protection Act" OR "consumer protection" OR (consumer w/5 protect*)
48	design w/3 (persuasive OR coercive)

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Custodians: Meta proposes that the above search terms be run on each agency’s custodial documents (including email and other custodial data sources), and relevant non-custodial data sources, that cover the entire period from January 1, 2012 to April 1, 2024 (with the limited exception for the Department of Child Safety based on the founding date provided by the agency), which encompasses the same time period from which Plaintiffs seek discovery, and have plead as the “Relevant Time[]” in Plaintiffs’ Complaint. *See* ECF No. 969; MDL Compl. ¶ 19 (alleging a “Relevant Time[]” that starts “no later than 2012”).

Meta proposes that the search terms set forth above should be run against at least the custodians listed below. Custodians designated with an asterisk (*) have been proposed by the Arizona AG’s office during the course of the Parties’ negotiations. To the extent that the custodians below do not cover the relevant time period or all relevant topics for each agency, the State and/or agency should propose additional custodians to Meta, and Meta reserves the right to select additional custodians.

Agency	Custodian	Title
Board of Education	Sean Ross*	Executive Director
Board of Education	Bruce DuPlanty*	Deputy Director
Board of Education	Tom Horne (AZ-proposed DOE custodian)	Superintendent
Board of Education	Dr. Jacqui Clay	County School Superintendent
Board of Education	Dr. Scott Hagerman	High School District Superintendent
Board of Education	Dr. José Luis Cruz Rivera	University President
Board of Education	Jessica Mueller*	Research and Data Analyst
Board of Education	Shannon Etz*	Project Director of Constituent Services
Board of Education	Federico Yanez*	Project Director of Policy
Dept. of Education	Tom Horne*	Superintendent of Public Instruction
Dept. of Education	Margaret Garcia Dugan*	Deputy Superintendent
Dept. of Education	Art Harding*	Chief Operations Officer
Dept. of Education	Edward Cota*	Chief Strategy Officer

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Agency	Custodian	Title
Dept. of Education	Sid Bailey*	Arizona Educator Leadership
Dept. of Education	Catherine Barrett*	Academic Achievement
Dept. of Education	Colette Chapman*	ESS/Child and Adult Programs
Dept. of Education	Joseph Guzman*	Accountability
Dept. of Education	Debbie Jackson*	Deputy Operations Officer
Dept. of Education	Mike Kurtenbach*	DAS School Safety
Dept. of Education	Mila Makal*	Director Character Education
Dept. of Education	Rick Medina*	Community Relations Manager
Dept. of Education	Doug Nick*	Communications Director
Dept. of Education	Camilla Strongin*	Director of Legislative Affairs
Dept. of Education	Bobby Bravo*	Deputy Director Legislative Affairs
Dept. of Education	Michelle Udall*	School Improvement
Dept. of Education	John Ward*	ESA Executive Director
Dept. of Education	Jim Waring*	Fed./State Liaison and Community Outreach
Dept. of Education	Mark Hodge*	Title IV – Student Support & Academic Enrichment
Dept. of Education	Rhae Lynne Clawson*	21st Century Community Learning Centers
Dept. of Education	Melissa Conner*	Health and Nutrition Services
Dept. of Education	Cara Alexander*	Health and Nutrition Services
Dept. of Child Safety	Sara Perry	Sr. Division Administrator – Chief Health Services Officer
Dept. of Child Safety	Sara Park*	Chief Medical Officer

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Agency	Custodian	Title
Dept. of Child Safety	Karla Mouw*	Assistant Director – CHP
Dept. of Child Safety	Frank Sweeney*	Assistant Director – Information Technology
Dept. of Child Safety	Megan Conrad	DCS Program Manager – Extended Foster Care
Dept. of Child Safety	Reynaldo Saenz	Assistant Director – Comptroller
Dept. of Child Safety	Jessica Anthony	Ombudsman
Dept. of Child Safety	Tanya Abdellatif	DCS Assistant Director of Foster Care & Post Permanency Support
Dept. of Child Safety	Gillian Vanasse*	DCS Chief Operating Officer
Dept. of Child Safety	Barbara Guillen	Permanency and Youth Services Manager
Dept. of Child Safety	Rebecca Krumm*	Acting Assistant Director, Office of Accountability
Dept. of Child Safety	Chris Gustafson	Chief Legislative Liaison
Dept. of Child Safety	David Lujan*	Deputy Director
Dept. of Child Safety	Shalom Jacobs*	Deputy Director
Dept. of Child Safety	Greg McKay*	Director
Dept. of Child Safety	Mike Faust*	Director
Dept. of Child Safety	Kylah Ross-Mount*	Training Administrator

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Agency	Custodian	Title
Dept. of Child Safety	Charles Flanagan	Director
Dept. of Child Safety	Matthew Stewart	Director
Dept. of Health Services	Jennifer Cunico*	Director
Dept. of Health Services	Sheila Sjolander*	Deputy Director, Public Health Services
Dept. of Health Services	Celia Nabor*	Assistant Director, Prevention Services
Dept. of Health Services	Lisa Villarroel*	Chief Medical Officer for Public Health
Dept. of Health Services	Susan Robinson*	Chief Strategy and Innovation Officer
Dept. of Health Services	Carly Fleege*	Legislative Liaison
Dept. of Health Services	Stacie Gravito*	Administrative Counsel and Chief, Office of Administrative Counsel & Rules
Dept. of Health Services	Kimberly Reid*	Administrative Counsel
Dept. of Health Services	Mckenna Baker*	Administrative Counsel
Dept. of Health Services	Stephanie Walaszek*	Marketing Coordinator & Interim Communications Director
Dept. of Health Services	Martin Celaya*	Chief, Bureau of Assessment and Evaluation
Dept. of Health Services	Emily Carlson*	Office of Tobacco Prevention and Cessation, Bureau of Chronic Disease

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Agency	Custodian	Title
		and Health Promotion, Division of Prevention Services
Dept. of Health Services	Teresa Manygoats*	Bureau Chief, Chronic Disease and Health Promotion, Division of Prevention Services
Dept. of Health Services	Angie Lorenzo*	Chief, Office of Women's Health
Dept. of Health Services	Laura Luna Bellucci*	Bureau Chief, Women's and Children's Health, Division of Prevention Services
Dept. of Health Services	Stephanie Elzenga*	General Counsel
Dept. of Health Services	Ravi Pitti *	Chief Data Officer